



**OZONE  
TRANSPORT  
COMMISSION**

**Statement of the Ozone Transport Commission Calling on the U. S.  
Environmental Protection Agency to Reduce Mobile Source Emissions in the  
Ozone Transport Region**

The Ozone Transport Commission (OTC) member states call on the U.S. Environmental Protection Agency (EPA) to significantly reduce pollution from gasoline-powered motor vehicles by promulgating stringent vehicle emission standards and lower sulfur content standards for gasoline. Adoption of federal "Control of Air Pollution from Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards" as proposed by EPA on March 29, 2013 will reduce ozone and ozone precursors in the Northeast and Mid-Atlantic states, as well as in upwind states, that significantly contribute to nonattainment of the ozone National Ambient Air Quality Standards (NAAQS) in the Ozone Transport Region (OTR).

EPA is required under the Clean Air Act to set NAAQS that are protective of human health and welfare. EPA lowered the health-based 8-hour ozone NAAQS to 75 parts per billion in 2008 and is anticipated to promulgate a more stringent standard in 2014. The OTC's modeling efforts demonstrate that gasoline-powered vehicles remain a significant contributor to ground level ozone. Based on this modeling demonstration, attainment of the 2008 health-based ozone standard will be impossible in the OTR without additional emission reductions from highway vehicles and other mobile sources. Ozone precursor emissions from mobile sources are the largest contributor to ozone levels within the OTR. As stated in the Preamble for EPA's proposed rule "Control of Air Pollution From Motor Vehicles: Tier 3 Motor Vehicle Emission and Fuel Standards," the vehicle emission standards, combined with the proposed reduction of gasoline sulfur content from the current 30 parts per million (ppm) average down to a 10-ppm average, is expected to result in a dramatic emission reduction of NO<sub>x</sub>, VOC, direct PM<sub>2.5</sub>, carbon monoxide and air toxics. (78 Fed. Reg. 29816). Cleaner vehicles under the Tier 3 program will significantly reduce ozone precursor emissions and other pollutants as these vehicles replace the existing vehicle fleet. Cleaner fuels will have the significant added advantage of reducing emissions from the in-use fleet by enabling catalytic converters to reduce pollution from all gasoline-powered vehicles by limiting "NO<sub>x</sub> creep" associated with sulfur build up in the catalyst. Without clean gasoline, existing and improved vehicle emission standards will not be as effective.

Finally, we anticipate that EPA will ensure flexibility for automobile manufacturers and refiners of gasoline through averaging, banking, trading programs, or other mechanisms as appropriate without diminishing the environmental benefits of the rule.

Adopted by the Commission on June 13, 2013

  
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